

**REMARKS**

Claims 1 and 15 have been amended in order to more particularly point out, and distinctly claim the subject matter to which the applicants regard as their invention. The applicants respectfully submit that no new matter has been added. It is believed that this Amendment is fully responsive to the Office Action dated **February 20, 2004**.

**Claim Rejections under 35 USC §103**

Claims 1-26 are rejected under 35 USC §103(a) as being unpatentable over either the admitted prior art of the instant disclosure or the Salvesen article in view of Kuzell, either of DE '205 or Oates et al., and further in view of GB '384.

The present invention is an arrangement of industrial plants placed in close proximity to each other including an oil refining plant, an oil-fired power plant, a cement plant, a steel making plant, and a waste gas treatment facility. Transporters interconnect the plants so that products and waste products from each plant may be transported to another plant for use as power or raw material. The cement plant may receive spent catalyst waste from the oil refining plant, drain sludge from the oil refining plant, slag and dust from the steel making plant, and gypsum from the waste gas treatment facility.

The Admitted Prior Art (APA) discloses "efficiency of energy utilization for heat and power is not so high on the whole" and that "waste materials are mostly transported to other places for disposal, and effective utilization of waste materials is not considered."

The Salvesen article describes the Kalundborg, Denmark industrial park in which the city, a power plant, a refinery, a fish farm, a pharmaceutical plant, a chemical manufacturer, and a wallboard maker exchange products. The power plant send residual steam to the refinery. The refinery sends gas to the power plant to produce steam and electricity. Sludge from the fish farm and pharmaceutical plant is used as fertilizer for nearby farms. The cement company uses fly ash from the power plant.

Kuzell discloses in the Drawing that calcium-aluminum-silicate slag is sent to a portland cement plant, and at page 6, left column, lines 55-57, state that “The slag from iron reduction furnace is a calcium alumino silicate and may be economically worked into Portland cement”.

DE ‘205 describes that sludges from oil refinery plants may be used by a cement plant.

Oates et al. describes using coal ash from coal fired plant in a cement plant.

Independent claims 1 and 15 patentably distinguish over the prior art relied upon by reciting, as exemplified by claim 1,

“A method of operating basic industrial plant complex, comprising the steps of: arranging basic industrial plants including an oil refining plant, an oil-fired power plant, a cement plant, a steelmaking plant, and a common waste gas treatment facility treating exhaust gas as gaseous waste from the oil refining plant, the oil-fired power plant, and the steelmaking plant in close proximity to or adjacent to each other; and combining said basic industrial plants by a plurality of transporters for partially or completely supplying product, byproduct or waste material from one of the basic industrial plants as a fuel, power source, and/or raw material for products to another plant in the basic industrial plants, transporting to said cement plant at least four selected from the group consisting of spent catalyst waste from the oil refining plant, drain sludge from a storage tank of the oil-refining plant, slag from the steelmaking plant, dust from the steelmaking plant and gypsum from the common waste gas treatment facility.” (Emphasis Added)

Therefore, withdrawal of the rejection of claims 1-26 under 35 USC §103(a) as being unpatentable over either the admitted prior art of the instant disclosure or the Salvesen article in view of Kuzell, either of DE '205 or Oates et al., and further in view of GB '384 is respectfully requested.

### Conclusion


In view of the aforementioned amendments and accompanying remarks, claims 1 and 15, as amended, are in condition for allowance, which action, at an early date, is requested.

If, for any reason, it is felt that this application is not now in condition for allowance, the Examiner is requested to contact Applicants undersigned attorney at the telephone number indicated below to arrange for an interview to expedite the disposition of this case.

In the event that this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. Please charge any fees for such an extension of time and any other fees which may be due with respect to this paper, to Deposit Account No. 01-2340.

Respectfully submitted,

ARMSTRONG, KRATZ, QUINTOS,  
HANSON & BROOKS, LLP



George N. Stevens  
Attorney for Applicant  
Reg. No. 36,938

GNS/alw  
Atty. Docket No. **991409A**  
Suite 1000  
1725 K Street, N.W.  
Washington, D.C. 20006  
(202) 659-2930



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